

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION

GULF SOUTH PIPELINE COMPANY, §  
LP, §  
Plaintiff, §

v. §

BR-TX-359.000: 123.343 ACRES, §  
MORE OR LESS, in the ASA Mitchell §  
League, Abstract Number 96, Brazoria §  
County, Texas; KENNETH EDWARD §  
LAMB; SARAH COLEMAN LAMB; §  
And CAPITAL FARM CREDIT, FLCA; §

BR-TX-360.000, 362,000: 55.0 ACRES, §  
MORE OR LESS, in the ASA Mitchell §  
League, Abstract Number 96, Brazoria §  
County, Texas; MICHAEL DALE §  
PENNEY and GLENN D. SALYER; §

**CIVIL ACTION NO. 3:16-cv-  
00205**

BR-TX: 361.00: 10.0 ACRES, MORE OR §  
LESS, in the ASA Mitchell League, §  
Abstract Number 96, Brazoria County, §  
Texas; MICHAEL D. PENNEY; §  
MARGARET RENEE PENNEY; §  
TEXAS GULF BANK, N.A.; and FIRST §  
STATE BANK; §

BR-TX-439.000: 8.0 ACRES, MORE OR §  
LESS, in the Stephen F. Austin League, §  
Abstract Number 22 and the Thomas W. §  
Grayson League, Abstract Number 196, §  
Brazoria County, Texas; and TYRUS §  
JEFFERS; §

BR-TX-439.500: 21.82 ACRES, MORE §  
OR LESS, in the Stephen F. Austin §  
League, Abstract Number 22 and the §

Thomas W. Grayson League, Abstract	§
Number 196, Brazoria County, Texas;	§
CHARLES E. KOVAR; TONIA R.	§
KOVAR; TEXAS DOW EMPLOYEES	§
CREDIT UNION; and CAPITAL	§
FARM CREDIT, FLCA, SUCCESSOR-	§
IN-INTEREST TO FIRST AG	§
CREDIT, FLCA; and	§
	§
UNKNOWN OTHERS,	§
Defendants.	§

**DEFENDANTS MICHAEL D. PENNEY AND MARGARET RENEE**

**PENNEY'S DISCLOSURE OF INTERESTED PARTIES**

Defendants Michael D. Penney and Margaret Renee Penney hereby certify the following is a complete list of all persons, associations of persons, firms, partnerships, corporations, affiliates, parent corporations, or other entities that are financially interested in the outcome of the litigation:

Michael D. Penney;

Margaret Renee Penney; and

CENLAR FSB (Central Loan Administration & Reporting).

Respectfully submitted,

**JOHNS MARRS ELLIS & HODGE LLP**

/s/ Justin Hodge

Justin Hodge (“Attorney-in-Charge”)

Texas Bar No. 24036791

Southern District Id. No. 35824

[jhodge@jmehlaw.com](mailto:jhodge@jmehlaw.com)

Zev Kusin

Texas Bar No. 24070096

Southern District Id. No. 1636769

[zkusin@jmehlaw.com](mailto:zkusin@jmehlaw.com)

Kyle Baum

Texas Bar No. 24082664

Southern District Id. No. 1795732

[kbaum@jmehlaw.com](mailto:kbaum@jmehlaw.com)

500 Dallas Street, Suite 500

Houston, Texas 77002

Telephone: (713) 609-9503

Facsimile: (713) 583-5825

**ATTORNEYS FOR DEFENDANTS**

**MICHAEL D. PENNEY AND**

**MARGARET RENEE PENNEY**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of September 2016, a true and correct copy of the foregoing was sent to the following:

J. Robin Lindley  
lindley@buckkeenan.com  
Andrew C. Wright  
wright@buckkeenan.com  
**BUCK KEENAN LLP**  
2229 San Felipe, Suite 1000  
Houston, Texas 77019  
Telephone: 713-225-4500  
Facsimile: 713-225-3719  
*Attorneys for Gulf South Pipeline  
Company, LP*

**Via CM/ECF**

/s/ Justin Hodge  
\_\_\_\_\_  
Justin Hodge